

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA §  
§  
-vs- § Cause No. 4:11cr100  
§ Judge Folsom  
WADE CARSON §

**MOTION FOR DETENTION HEARING**

COMES NOW the United States and asks this Honorable Court to set the instant case for detention hearing under Title 18, United States Code, section 3141, et. seq., and would show the Court the following:

1. The pending case involves:

- [ ] (A) A crime of violence.
- [ ] (B) An offense for which the maximum sentence is life imprisonment or death.
- [ ] (C) An offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act, the Controlled Substances Import and Export Act or Title 21, United States Code, section 955(a).
- [ ] (D) A felony committed after the Defendant had been convicted of two or more prior offenses described in Title 18, United States Code, section 3142(f)(1)(A)(C) or comparable state or local offenses.
- [ X ] (E) A serious risk that the Defendant will flee.
- [ ] (F) A serious risk that the person will obstruct or attempt to obstruct justice, or attempt to threaten, injure or intimidate a prospective witness or juror.
- [ ] (G) The person was on release pending trial for a felony under State, Federal or Local law; or was on probation or parole for an offense under State, Federal or Local law.

- [ ] (H) A felony that involves a minor victim.
- [ ] (I) A felony that involves the possession or use of a firearm or destructive device or any dangerous weapon.
- [ ] (J) A felony that involves the failure to register under Title 18, United States Code, Section 2250.

2. No condition or combination of conditions will:

- [ ] (A) Reasonably assure the appearance of the person as required.
- [X] (B) The safety of the community or any other person.

3. Pursuant to Title 18, United States Code, section 3142(d), the person should be detained for a period of not more than ten days excluding Saturdays, Sundays and holidays.

WHEREFORE, PREMISES CONSIDERED, the Government requests that the Defendant be held without bond.

Respectfully submitted,

JOHN M. BALES  
United States Attorney

/s/

MANDY GRIFFITH  
Assistant United States Attorney  
Texas Bar #24032251  
101 East Park Blvd., Ste. 500  
Plano, TX 75074  
972/509-1201  
FAX: 972/509-1209  
[mandy.griffith@usdoj.gov](mailto:mandy.griffith@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing will be delivered to the attorney of record for defendant via hand delivery, on the 25th day of April, 2011.

/s/  
MANDY GRIFFITH